



116 VILLAGE BOULEVARD, SUITE 200  
PRINCETON, NEW JERSEY 08540  
609.734.4380  
  
52 DUANE STREET, 7TH FLOOR  
NEW YORK, NEW YORK 10007  
212.933.9323  
PKATZLEGAL.COM

April 1, 2021

**BY EMAIL**

Hon. Richard M. Berman  
United State District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Muge Ma, 20 CR 407 (RMB)*

Dear Judge Berman:

I am counsel to Mr. Ma in the above referenced case. I submit this letter on behalf of the parties to request an adjournment of the telephonic status conference scheduled for April 5, 2021 until the week of April 26, 2021 or thereafter.

As I have noted in a previous letter, since the indictment against Mr. Ma was filed on August 17, 2020, the government has produced voluminous discovery, and the parties have been engaged in on-going plea discussions that would obviate the need for a trial. We are currently finalizing plea agreement terms and firmly believe that a trial is very unlikely in this case. Accordingly, in order to allow time for the parties to complete our negotiations, the parties respectfully request that the April 5, 2021 conference be adjourned until April 26, 2021 or thereafter.

The parties also respectfully request that time be excluded under the Speedy Trial Act until the next conference date set by the Court pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The parties submit that the exclusion of time best serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial as it will allow time for the parties to continue our on-going discussions regarding a potential disposition of this matter. I have consulted with Assistant U.S. Attorney Sagar Ravi who consents to this adjournment request and to the exclusion of time on behalf of the government.

Thank you for your attention to this matter.

Application granted. Conference
adjourned to May 3, 2021 at 9:00 AM.
Time is excluded pursuant to the
Speedy Trial Act for the reasons set
forth in this letter.

SO ORDERED:  
Date: 4/2/21

  
Richard M. Berman, U.S.D.J.

Sincerely,

  
Peter Katz, Esq.  
Counsel to Muge Ma